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March 8, 2012

VIA HAND DELIVERY

The Honorable Harold Baer, Jr.
 U.S. District Court for the
 Southern District of New York
 United States Courthouse
 500 Pearl Street, Suite 2230
 New York, NY 10007-1312

The Honorable Kimba M. Wood
 U.S. District Court for the
 Southern District of New York
 United States Courthouse
 500 Pearl Street, Suite 1901
 New York, NY 10007-1312

Re: U.S. v. Carollo, et al., No. 10 Cr. 654 (HB)
U.S. v. Ghavami, et al., No. 10 Cr. 1217 (KMW)

Dear Judges Baer and Wood:

For the reasons set forth in the attached letter, which Third-Party Movants Investment Management Advisory Group, Inc. ("IMAGE"), David Eckhart, and Martin J. Stallone (collectively, "the IMAGE Movants") request not be entered on the docket, the IMAGE Movants respectfully request leave to file a brief sur-reply to the Government's Application for an Order Resolving Claims of Attorney-Client Privilege or Attorney Work Product as to Consensual Recordings.

Respectfully submitted,

Richard L. Scheff
 Richard L. Scheff, Esq.
 Montgomery, McCracken, Walker & Rhoads, LLP

Christopher R. Hall
 Christopher R. Hall, Esq.
 Saul Ewing LLP

cc: All counsel of record in the above-captioned cases (via email)
Date: 3/30/12

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MONTGOMERY MCCRAKEN WALKER & RHOADS LLP

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Endorsement:

Sur reply - 4 pages copy sent to Chambers will be allowed.